

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**ROBERT HARRIS, ET AL.**

**PLAINTIFFS**

**VS.**

**CIVIL ACTION NO. 3:22-CV-479-TSL-MTP**

**SAM DOBBINS, ET AL.**

**DEFENDANTS**

**RESPONSE IN OPPOSITION TO PLAINTIFF’S MOTION FOR TEMPORARY  
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Municipal Defendants the City of Lexington and Chief Charles Henderson, in his individual and official capacities, submit their Response in Opposition to Plaintiff’s Motion for Temporary Restraining Order and Preliminary Injunction. The contemporaneously filed memorandum explains in detail why Plaintiffs’ motion should be denied, including lack of jurisdiction, the relief requested is not permitted under the law, and Plaintiffs do not come close to meeting the requirements for a preliminary injunction.

In addition to the Memorandum, Municipal Defendants offer the following:

Exhibit “A” – Declaration of Mayor Robin McCrory;

Exhibit “B” – Declaration of Chief Charles Henderson;

Exhibit “C” – Hooker Recording of Sam Dobbins (conventionally filed);

Exhibit “D” – Fireworks Ordinance;

Exhibit “E” – Harris Brothers Video (conventionally filed);

Exhibit “F” – Harris Brothers Arrest Documents;

Exhibit “G” – January 18, 2022 Warrant Affidavits and Warrants;

Exhibit “H” – Reeves Arrest Documents;

Exhibit “I” – Stewart Arrest Documents;

Exhibit “J” – Stewart Video (conventionally filed);

Exhibit “K” – Redmond Arrest Documents;

Exhibit “L” – Walter Pitchford Affidavit; and

Exhibit “M” – Harrison Keys Video (conventionally filed).

For the reasons explained in the accompanying Memorandum, Municipal Defendants respectfully request that the Court deny Plaintiff’s motion.

Dated: September 7, 2022

Respectfully submitted,

**PHELPS DUNBAR, LLP**

BY: /s/ G. Todd Butler

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**ATTORNEYS FOR THE CITY OF  
LEXINGTON AND CHIEF  
CHARLES HENDERSON**

**CERTIFICATE OF SERVICE**

I certify that, on September 7, 2022, I had a copy of this document electronically filed with the Clerk of the Court, using the CM/ECF system, which sent notification of such filing to all counsel of record.

*/s/ G. Todd Butler*

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G. TODD BUTLER